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17 UNITED STATES DISTRICT COURT  
18 NORTHERN DISTRICT OF CALIFORNIA  
19 SAN FRANCISCO DIVISION

20 WAYMO LLC,  
21 Plaintiff,  
22 v.  
23 UBER TECHNOLOGIES, INC.,  
24 OTTOMOTTO LLC; OTTO TRUCKING LLC,  
25 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF ESTHER KIM  
CHANG IN SUPPORT OF  
DEFENDANTS' ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL**

Trial Date: October 2, 2017

1 I, Esther Kim Chang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I am a member in  
3 good standing of the Bar of the State of California. I make this declaration based upon matters  
4 within my own personal knowledge and if called as a witness, I could and would competently  
5 testify to the matters set forth herein. I make this declaration in support of Defendants'  
6 Administrative Motion to File Under Seal Portions of Defendants' Response to the Court's  
7 Questions for Hearing on Plaintiff's Motion for Provisional Relief ("Defendants' Response").

8 2. Certain highlighted portions of Defendants' Response contain highly confidential,  
9 detailed market strategy information of Uber. If this information were made public, it could  
10 irreparably harm Uber. This information is maintained as confidential by Uber. The public  
11 disclosure of this information would give Uber's competitors access to confidential market  
12 strategy information. If such information were made public, Uber's competitive standing could  
13 be significantly harmed. These portions are highlighted in blue.

14 3. Certain highlighted portions of Defendants' Response contain information that  
15 Plaintiff Waymo LLC has designated as "Confidential" or "Highly Confidential – Attorneys'  
16 Eyes Only" in accordance with the Patent Local Rule 2-2 Interim Model Protective Order  
17 ("Protective Order"), which the parties have agreed govern this case (Transcript of 3/16/2017  
18 Hearing, page 6). These portions are highlighted in green.

19 4. Defendants are required to file this material under seal in accordance with  
20 Paragraph 14.4 of the Protective Order.

21 I declare under penalty of perjury under the laws of the United States that the foregoing is  
22 true and correct. Executed this 2nd day of May, 2017, in San Francisco, California.

23  
24 /s/ Esther Kim Chang  
25 Esther Kim Chang  
26  
27  
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**ATTESTATION OF E-FILED SIGNATURE**

I, Arturo J. González, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Esther Kim Chang has concurred in this filing.

Dated: May 2, 2017

/s/ Arturo J. González  
Arturo J. González